



May 3, 2002

VIA ELECTRONIC FILING

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
445 Twelfth Street, SW- TW - A235
Washington, DC 20554

**Re: In the Matter of Winstar Communications, LLC Emergency Petition
for Declaratory Ruling Regarding ILEC Obligations to Continue
Providing Services; WC Docket No. 02-80**

Dear Ms. Dortch:

Attached are the Associations for Local Telecommunications Services' (ALTS)
Reply Comments in the above captioned proceeding.

Sincerely,

/s/

Teresa K. Gaugler
Association for Local
Telecommunications Services



May 3, 2002

VIA ELECTRONIC FILING

Ms. Dorothy Attwood
Chief, Common Carrier Bureau
Federal Communications Commission
445 Twelfth Street, SW
Washington, DC 20554

**Re: In the Matter of Winstar Communications, LLC Emergency Petition
for Declaratory Ruling Regarding ILEC Obligations to Continue
Providing Services; WC Docket No. 02-80**

Dear Ms. Attwood:

Please accept this letter as the Association for Local Telecommunications Services' (ALTS) Reply Comments in the above-captioned proceeding.

IDT Winstar recently purchased the assets of bankrupt Winstar Wireless, Inc ("Old Winstar") and began attempting to migrate customers from Old Winstar to IDT Winstar. After encountering difficulties in doing so, IDT Winstar has sought the Commission's assistance in resolving its disputes with several RBOCs. These RBOCs have denied or delayed provisioning of facilities and services that are exclusively under their monopoly control. The RBOCs are notorious for abusing their monopoly control over bottleneck facilities, and ALTS is concerned that they are again taking this opportunity to use that power to unfairly disadvantage a competitor. ALTS urges the Commission to act swiftly to ensure seamless transition of Old Winstar customers to IDT Winstar and not allow the RBOCs to hold those customers hostage until they receive the concessions they demand from competitors.

Sincerely,

/s/

Teresa K. Gaugler